IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

V.

Case No. CR 21-370 - RAW

ROBERT ERIC WADKINS,

Defendant.

INDICTMENT

The Federal Grand Jury charges:

COUNT ONE

KIDNAPPING IN INDIAN COUNTRY [18 U.S.C. §§ 1201(a)(2), 1151 & 1153]

From on or about June 5, 2017, to on or about June 6, 2017, within the Eastern District of Oklahoma, in Indian Country, the defendant, **ROBERT ERIC WADKINS**, an Indian, did unlawfully kidnap, abduct, seize, confine, carry away and hold for some benefit, T.H., in violation of Title 18, United States Code, Sections 1201(a)(2), 1151 and 1153.

COUNT TWO

AGGRAVATED SEXUAL ABUSE IN INDIAN COUNTRY [18 U.S.C. §§ 2241(a), 2246(2)(A), 1151 & 1153]

Between on or about June 5, 2017 and June 6, 2017, within the Eastern District of Oklahoma, in Indian Country, the defendant, **ROBERT ERIC WADKINS**, an Indian, did knowingly cause and attempt to cause T.H. to engage in a sexual act as defined in Title 18, United States Code, Section 2246, to wit: penetration, however slight, between the penis and vulva of T.H., by using force against T.H. and by threating and placing T.H. in fear that any person would

be subjected to death, serious bodily injury, and kidnapping, said sexual act occurring near and in a motor vehicle, in violation of Title 18, United States Code, Sections 2241(a), 2246(2)(A), 1151 & 1153.

COUNT THREE

AGGRAVATED SEXUAL ABUSE IN INDIAN COUNTRY [18 U.S.C. §§ 2241(a), 2246(2)(A), 1151 & 1153]

Between on or about June 5, 2017 and June 6, 2017, within the Eastern District of Oklahoma, in Indian Country, the defendant, ROBERT ERIC WADKINS, an Indian, did knowingly cause and attempt to cause T.H. to engage in a sexual act as defined in Title 18, United States Code, Section 2246, to wit: penetration, however slight, between the penis and vulva of T.H., by using force against T.H. and by threating and placing T.H. in fear that any person would be subjected to death, serious bodily injury, and kidnapping, said sexual act occurring near a set of railroad tracks, in violation of Title 18, United States Code, Sections 2241(a), 2246(2)(A), 1151 & 1153.

A TRUE BILL:

Pursuant to the E-Government Act, the original indictment has been filed under seal in the Clerk's Office.

s / Foreperson

FOREPERSON OF THE GRAND JURY

CHRISTOPHER J. WILSON

Acting United States Attorney

EDITH A. SINGER, OBA#1943

Assistant United States Attorney